

CONTAINS CONFIDENTIAL BUSINESS INFORMATION – ATTORNEYS’ EYES ONLY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SCOTT MCCANDLISS, DMIDRIY
ABRAMYAN, ABDIKADIR AHMED,
AHMED KATUN AHMED, AHMED
HASSAN, BEN STEWART ROUNTREE,
FAHEEM IQBAL QURESHI, ANTHONY D.
LOGAN, MOHAMED ABDULLE, HAMOUD
S. ALDAHBAI, JAMAL ABDI, ABDILAH
AWALE, MOHAMED A. HUSSEIN and all
others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC., UBER
TECHNOLOGIES (GA), INC., RASIER, LLC
and
KEITH RADFORD, AHMED SIMJEE,
JOSHUA GANTT, LESLIE GILMARTIN,
BRIAN GIQUEL, CHRISTOPHER BOSAK,
CHRISTOPHER JOHNSON, KEVIN
BUTTIMER, DANIEL ANDERSON, JOHN
STETTNER, RACHEL PIETROCOLA, JOSH
VARCOE, FABIAN FERNANDEZ, AMINUR
CHOUDHURY, SEID SHEK, ABEBE
TESFAYE, SAMUEL WORKU, JEAN
RICHARD PIERRE, ALEXANDER
AGBAERE, AYODELE OKPODU, BELAY
DAGNEW, individually and all others similarly
situated,

Defendants.

DECLARATION OF JACOB GALEY

Civil Action No. 1:14-03275- WSD

CONTAINS CONFIDENTIAL BUSINESS INFORMATION – ATTORNEYS' EYES ONLY

DECLARATION OF JACOB GALEY

I, Jacob Galey, hereby declare and state as follows:

1. I am at least of eighteen years of age and, if called on to testify as a witness, can testify competently to the matters and facts set forth herein except when those matters and facts are stated on information and belief and, as to those allegations, to the extent permitted by the Federal Rules of Evidence.
2. I work and reside in San Francisco, California.
3. I am an employee of Uber Technologies, Inc. ("Uber"), a Defendant in the above captioned action, and have been an employee of Uber since February 2013.
4. My title is Financial Planning & Analysis Manager.
5. My team is responsible for Uber's financial forecasting, planning and budget setting. I have first-hand knowledge of Uber's business and financial records related to Uber's operations and services in the City of Atlanta.
6. Uber's smartphone application service launched in Atlanta in July 2012.
7. The fares paid for transportation services requested through Uber's smartphone application are passed to the independent, third-party transportation companies or drivers who use the Uber software application to receive transportation requests. Uber retains a portion, approximately 20% in Atlanta, that it collects as a fee for its software and services, from the transportation companies/drivers.
8. From launch in 2012 through August 2014, the transportation services requested through Uber's smartphone application in Atlanta generated well over \$5 million in gross fares.

CONTAINS CONFIDENTIAL BUSINESS INFORMATION – ATTORNEYS' EYES ONLY

9. In fact, from launch in 2012 through August 2014, the approximately [REDACTED] of gross fares that Uber retained as a fee from the third-party transportation companies/drivers for use of its software and services in the City of Atlanta was, alone, well over \$5 million dollars.

10. Keith Radford is also currently an Uber employee.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed in San Francisco, CA

Dated: November 12, 2014

Signed: _____

A handwritten signature in black ink, appearing to be "KR", is written over a horizontal line.

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2014, I filed a copy of the foregoing document using the Court's ECF/CM system, which will automatically send notice of such filing to counsel for Plaintiffs:

William A. Pannell
WILLIAM A. PANNELL, P.C.
433 Chateau Drive, NW
Atlanta, GA 30305

I further certify that on November 20, 2014, I served a copy of the foregoing to counsel for Plaintiffs by depositing a copy in the U.S. Mail, first class postage prepaid, addressed as follows:

Keith E. Fryer
FRYER, SHUSTER & LESTER, PC
1050 Crown Pointe Parkway, Suite 410
Atlanta, GA 30338

/s/ Michael W. Tyler
Michael W. Tyler